

# EXHIBIT 1



AMERICAN  
ARBITRATION  
ASSOCIATION®

INTERNATIONAL CENTRE  
FOR DISPUTE RESOLUTION®

## AMERICAN ARBITRATION ASSOCIATION DEMAND FOR ARBITRATION CONSUMER ARBITRATION RULES

1. Which party is sending in the filing documents?

Consumer ☒ Business ☐

2. Briefly explain the dispute:

This dispute arises from Valve Corporation's ("Valve") anticompetitive conduct whereby current and former subscribers to Valve's on-line gaming platform, Steam, including Claimant, paid supracompetitive prices for the on-line video games and downloadable content ("DCL") they purchased to use on Valve's on-line gaming platform, Steam. Valve's anticompetitive conduct includes, *inter alia*, Valve's use of a Platform Most Favored Nations ("PMFN") provision in its agreements with game developers and publishers which, due to Valve's market power, stifled and harmed competition in the on-line PC game distribution market. The PMFN prevented game developers and publishers from selling their games on other on-line gaming sites with lower costs and/or sales commissions for lower prices than they sold their games on the Steam platform. Valve was therefore able to charge and maintain its supracompetitive 30% commission on each Steam enabled game sold, forcing game publishers to charge consumers, including Claimant, more for their Steam enabled games and DLC than they otherwise would have in a competitive market.

Claimant contends that Valve is liable to Claimant for Illegal Monopoly Maintenance in Violation of 15 U.S.C. § 2, Illegal Attempted Monopolization in Violation of 15 U.S.C. § 2, Anticompetitive Course of Conduct in Violation of 15 U.S.C. § 1 and violation or related state laws.

Claimant seeks damages, including, but are not limited to, the recovery of overcharges which are subject to trebling, prejudgment interest, costs and attorney fees. See 15 U.S.C. § 15(a).

3. Specify the amount of money in dispute, if any: \$13.65

4. State any other relief you are seeking:

- Attorney Fees
- Interest
- Arbitration Costs
- Other: Trebled damages, Prejudgment Interest, Costs and Attorneys' Fees.

5. Identify the requested city and state for the hearing if an in-person hearing is held:

City: San Diego State: CA

6. Please provide contact information for both the Consumer and the Business. Attach additional sheets or forms as needed.

### Consumer:

Name: Ryan Joseph Lally  
Address: 3785 Mount Ainsworth Ave,  
City: San Diego  
State: CA  
Zip Code: 92111  
Telephone: +16194946354  
Email: ryanlallysd@gmail.com

**Consumer's Representative (if known):**

Name: Gary E. Mason  
Firm: Mason LLP  
Address: 5335 Wisconsin Avenue, N.W., Suite 640  
City: Washington  
State: DC  
Zip Code: 20015-2052  
Telephone: (202) 429-2290  
Fax: 202-429-2294  
Email: [gmason@masonllp.com](mailto:gmason@masonllp.com)

Name: Kenneth J. Rubin  
Firm: Vorys, Sater, Seymour and Pease LLP.  
Address: 52 East Gay Street  
City: Columbus  
State: OH  
Zip Code: 43215  
Telephone: (614)-464-5692  
Fax:  
Email: [kjrubin@vorys.com](mailto:kjrubin@vorys.com)

**Business:**

Name: Valve Corporation  
Address: Valve Corporation, P.O. Box 1688  
City: Bellevue,  
State: WA  
Zip Code: 98004  
Telephone:  
Fax:  
Email:

**Business' Representative (if known):**

Name: Charles Casper  
Firm: Montgomery McCracken  
Address: 1735 Market Street  
City: Philadelphia  
State: PA  
Zip Code: 19103  
Telephone: 215-772-1500  
Fax: 215-772-7620  
Email: [ccasper@mmwr.com](mailto:ccasper@mmwr.com)

Date: 10/30/2023

**7. Send a copy of this completed form to the AAA together with:**

- A clear, legible copy of the contract containing the parties' agreement to arbitrate disputes;
- The proper filing fee (filing fee information can be found in the Costs of Arbitration section of the Consumer Arbitration Rules); and
- A copy of the court order, if arbitration is court-ordered.

**8. Send a copy of the completed form and any attachments to all parties and retain a copy of the form for your records.**

To file by mail, send the initial filing documents and the filing fee to: AAA Case Filing Services, 1101 Laurel Oak Road, Suite 100, Voorhees, NJ 08043.

To file online, visit [www.adr.org](http://www.adr.org) and click on **File or Access Your Case** and follow directions. To avoid the creation of duplicate filings, the AAA requests that the filing documents and payment be submitted together. When filing electronically, no hard copies are required.

Pursuant to Section 1284.3 of the California Code of Civil Procedure, consumers with a gross monthly income of less than 300% of the federal poverty guidelines are entitled to a waiver of arbitration fees and costs, exclusive of arbitrator fees. This law applies to all consumer agreements subject to the California Arbitration Act, and to all consumer arbitrations conducted in California. If you believe that you meet these requirements, you must submit a completed Affidavit for Waiver of Fees, available on our website.

Pursuant to New Jersey Statutes § 2A:23B-1 et seq. consumers with a gross monthly income of less than 300%

of the federal poverty guidelines are entitled to a waiver of arbitration fees and costs, exclusive of arbitrator fees. This law applies to all consumer agreements subject to the New Jersey Arbitration Act, and to all consumer arbitrations conducted in New Jersey. If you believe that you meet these requirements, you must submit a completed Affidavit for Waiver of Fees, available on our website.

American Arbitration Association, Case Filing Services, 1101 Laurel Oak Road, Suite 100, Voorhees, NJ 08043  
<https://www.adr.org> | AAA Customer Service 1-800-778-7879